

**Debevoise  
& Plimpton**

**Debevoise & Plimpton LLP**  
66 Hudson Boulevard  
New York, NY 10001  
+1 212 909 6000

**Helen V. Cantwell**  
**Partner**  
hcantwell@debevoise.com  
+1 212 909 6312

November 13, 2024

VIA ECF

The Honorable Laura Taylor Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. William Tomita*, 22 Cr. 231 (LTS)**

Dear Judge Swain:

I represent defendant William Tomita in the above-captioned matter. I write to respectfully request the Court's permission for Mr. Tomita to travel to Japan, in particular Tokyo, Japan and the Osaka, Japan area, during the period from November 19 to November 27, 2024. The purpose of the trip would be for Mr. Tomita to visit his grandmother, who is turning 101 this month.

Mr. Tomita's conditions of release permit him to travel in the continental United States and require him to surrender any passports. This request seeks permission for him to travel to Tokyo, Japan via a direct flight leaving from the continental United States; to travel in Japan while he is there, including between Tokyo and Osaka by train; to return to the continental United States via a direct flight at the conclusion of his trip; and to have his U.S. and Japanese passports temporarily returned to him prior to his travel. Mr. Tomita would travel from the United States on November 19 and return to the United States on November 27. Mr. Tomita's passports would be returned to Pretrial Services on Monday, December 2, following the Thanksgiving holiday.

I have conferred with the U.S. Attorney's Office regarding this request, and they have advised me that they do not object. Pretrial Services has also informed Mr. Tomita that they do not object to the travel proposed here.

I respectfully request that the Court endorse this letter to permit Mr. Tomita to travel as proposed.

Respectfully submitted,



Helen V. Cantwell